



1155 Avenue of the Americas  
22nd Floor  
New York, NY 10036-2711

T +1.212.262.6900  
F +1.212.977.1649  
PerkinsCoie.com

July 9, 2025

Keith Miller  
KeithMiller@perkinscoie.com  
D. +1.212.262.6906  
F. +1.212.977.1641

**VIA ECF**

Honorable Gregory H. Woods  
U.S. District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 7/9/2025
---

**MEMORANDUM ENDORSED**

**Re: XXIII Capital Limited v. Decade, S.A.C., LLC et al., Case No. 17-cv-06910-GHW**

Dear Judge Woods:

We represent Defendants Aaron Goodwin, Eric Goodwin, Goodwin Associates Management Enterprises, Inc. and Goodwin Sports Management, Inc. (“Defendants”) in the above-captioned matter and write jointly with Plaintiff XXIII Capital Limited (“Plaintiff”) to request a six-week extension of the deadlines for (i) Defendants to answer the Second Amended Complaint, which is currently set for July 11, 2025, and (ii) the Parties to file the joint proposed case management plan and scheduling order, which is currently set for July 30, 2025. The proposed new dates are August 22, 2025, and September 10, 2025, respectively. This is the fifth request for an adjournment of these deadlines. As previously reported to the Court, the parties agreed to mediate this dispute before a JAMS mediator. *See* Dkt. No. 393. Because the mediation proceedings are ongoing, the Parties respectfully request an adjournment of the current deadlines to facilitate prospective discussions between the Parties to resolve the present dispute. Should the Court wish to schedule a conference call to discuss the situation, the Parties are available at the Court’s convenience. We thank the Court for its consideration of this request.

Respectfully submitted,

**PERKINS COIE LLP**

By: /s/ Keith Miller  
Keith W. Miller  
Adam R. Mandelsberg  
1155 Avenue of the Americas  
22<sup>nd</sup> Floor  
New York, NY 10036  
Tel: (212) 262-6900  
Fax: (212) 977-1649  
[Keithmiller@perkinscoie.com](mailto:Keithmiller@perkinscoie.com)  
[Amandelsberg@perkinscoie.com](mailto:Amandelsberg@perkinscoie.com)

*Counsel to Aaron Goodwin, Eric Goodwin, Goodwin Associates Management Enterprises, Inc. and Goodwin Sports Management, Inc.*

**PILLSBURY WINTHROP SHAW PITTMAN LLP**

By: /s/ Patrick E. Fitzmaurice

Patrick E. Fitzmaurice

Brian L. Beckerman

Stephanie M. Coughlan

31 West 52<sup>nd</sup> Street

New York, NY 10019

Tel: (212) 858-1000

Fax: (212) 858-1500

patrick.fitzmaurice@pillsburylaw.com

brian.beckerman@pillsburylaw.com

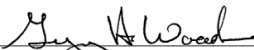
stephanie.coughlan@pillsburylaw.com

*Counsel to XXIII Capital Limited*

Application granted. The deadline for Defendants Aaron Goodwin, Eric Goodwin, Goodwin Associates Management Enterprises, Inc. and Goodwin Sports Management, Inc. to answer or otherwise respond to the Second Amended Complaint is extended to August 22, 2025. The initial pretrial conference scheduled for August 6, 2025 is adjourned to September 18, 2025 at 4:00 p.m. The joint status letter and proposed case management plan described in the Court's December 23, 2024 order, Dkt. No 390, are due no later than September 11, 2025. The Clerk of Court is instructed to terminate the motion pending at Dkt. No. 400.

SO ORDERED.

Dated: July 9, 2025  
New York, New York

  
GREGORY H. WOODS  
United States District Judge